



30 Ramland Road, Suite 201 Orangeburg, New York 10962 TEL: 845.589.9300 FAX: 845.638.2707

September 19, 2022

Via ECF

Honorable Andre M. Espinosa, U.S.M.J.
Martin Luther King Jr. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: JOHNSON v. THE TRANSPORTATION CORPORATION et al.
2:22-cv-02698-JXN-AME

Letter Motion for Extension of Time to Respond to the Complaint

Dear Judge Espinosa,

This office has recently been retained to represent The Transportation Corporation (the “Company”), Kevin Dale, Ryan Dale, Jesse Decrescenzo, and Loy Ortiz, (collectively “Transportation Corp. Defendants”). We write to respectfully request a 30-day extension of time for Transportation Corp. Defendants who have received service of process to answer or otherwise respond to pro se Plaintiff Ryan Johnson’s Complaint (the “Complaint”, Dkt. No. 1).

It is our understanding that Transportation Corp. Defendants (except for. Jesse Decrescenzo, whom we understand has not been served) were served on or around August 31, 2022.¹ Thus, the served Transportation Corp. Defendants have until September 21, 2022 to respond to the Complaint. Should Your Honor grant the instant request, the deadline for the response would be **October 21, 2022**.

This is served Transportation Corp. Defendants’ first request for an extension of time to respond to the Complaint. On September 14, 2022, this office contacted Plaintiff via email (via the address Plaintiff provided on the docket), informing Plaintiff of our intention to file the instant request and requesting Plaintiff’s position as to the request. On September 16, 2022, this office followed up with Plaintiff by phone (at the number Plaintiff provided on the docket) and left a voicemail. As of the time of this letter motion, we have not heard back from the Plaintiff.

The additional time is necessary to allow served Transportation Corp. Defendants to sufficiently review Plaintiff’s allegations and properly respond.

¹ No affidavit of service has been filed.

We thank Your Honor for the attention to and consideration of this request.

Respectfully,

/s/ Kevin Doherty

Kevin Doherty, Esq.

cc: VIA overnight delivery and e-mail,
Plaintiff *pro se*, RYAN JOHNSON
42 BANK STREET 1ST FLOOR
SUSSEX, NJ 07461
973-424-3584
Email: ryanLjohnson@msn.com